



NATIONAL CONSUMERS LEAGUE

1701 K Street, NW, Suite 1200, Washington, DC 20006

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May 7, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 98P-0968, Food Labeling: Declaration of Ingredients

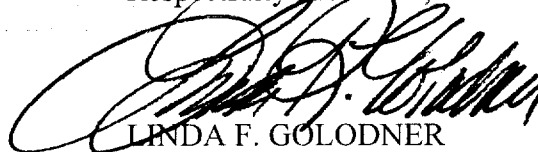
The National Consumers League is pleased to support the Food and Drug Administration's proposed revision in labeling requirements for surimi and surimi-containing foods.

The proposed changes, which would permit "and/or" ingredient labeling for the species of fish used in these foods will have a positive impact for consumers. Current requirements say that surimi, which often blends two or more fish species, must bear the name of each ingredient used. FDA notes in the proposed rule that this may increase production costs by requiring manufacturers to maintain and use multiple labels for what is essentially the same product. Also, it may limit the availability of these products. The proposed change may result in slightly lower prices for consumers, a beneficial outcome.

While NCL generally supports ingredient labeling which specifies the exact components of a food product, in the case of surimi, the specific species used has little or no effect on the finished product's quality or nutritional value. The trade off for disjunctive labeling seems appropriate. Additionally, Surimi provides a reduced cost, nutritious alternative to shrimp, crab, and lobster, all of which are significant allergens for certain members of the population. For the most part, the ingredients which make-up surimi including whiting, white fish, pollack, and cod are not allergens. Finally, by including all possible species that may be present, consumers will receive no less label information than under current rules. Consumers will have the opportunity to select or avoid products based upon their personal taste and needs.

Thank you for this opportunity to comment on this proposed ingredient labeling change.

Respectfully submitted,


LINDA F. GOLODNER
President

98P-0968

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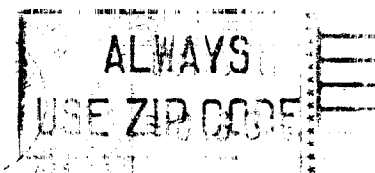
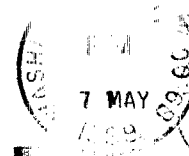
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